



An Roinn Iompair
Department of Transport

Marine Notice No. 53 of 2020

Notice to all Maritime Stakeholders

Development of a Strategy for the Irish Maritime Directorate

The Irish Maritime Directorate (IMD) is the term used to reflect the wide range of maritime responsibilities that fall within the remit of the Department of Transport. With Brexit on the horizon and an impending audit to be carried out by the International Maritime Organization, the decision was taken to review the work of the Directorate. This has led to the development of this strategy.

The draft maritime strategy is centred around six Core Objectives which essentially capture the wide range of activities undertaken by the IMD in a coherent manner and serve to clarify the policy imperative that underpins them. These objectives are:

1. Enhance Maritime Safety through effective regulation, implementation and compliance
2. Facilitate Maritime Trade and Connectivity
3. Deliver an effective Maritime Emergency Response (SAR and maritime casualty & pollution response)
4. Protect the Environment from Ship Source Pollution
5. Strive for Organisational Excellence
6. Focus on Customer Service and Stakeholder Engagement

Consideration has been given to what the IMD needs to do, in addition to what we currently do, in order to deliver on each Core Objective.

The final strategy will fall out of the Department of Transport's Statement of Strategy and as such will be consistent with and seek to deliver on relevant Programme for Government commitments. It will also aim to embed an ethos of continuous improvement including regular reviews of procedures and practices, stakeholder engagement and communication strategies with the ultimate aim to measure and enhance our performance against the objectives set.

You are invited to review the proposed recommendations set out under each Core Objective in the consultation document attached and provide any comments you may have in relation to them as well as putting forward any views generally in relation to the development of a maritime strategy.

Reponses should be sent by email to maritimestrategy@transport.gov.ie before 5pm on Friday 11 December 2020. It is intended that all responses will be considered in the development of a final published maritime strategy document.

The Department will not be replying individually to submissions. All submissions received are subject to Freedom of Information legislation. As a means of encouraging discussion and in the interest of transparency, it is our intention to post any submissions received on the Department's website unless we are requested not to do so.

Irish Maritime Administration,
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12/11/2020

Encl: Consultation document

Development of a Strategy for the Irish Maritime Directorate

1. Background

The Irish Maritime Administration was established in 2013 with an overall objective to integrate the planning, coordination and delivery of all the maritime services of the then Department of Transport, Tourism and Sport under a single national office in order to provide for a more efficient and effective delivery of maritime services. Given the passage of time, the impending International Maritime Organization (IMO) Audit (scheduled at that time for November 2021) and Brexit on the horizon, a review of the role of the IMA was considered timely.

It should be acknowledged that the concept of a “Maritime Administration” is a term recognised by the (IMO) and the European Maritime Safety Agency in the context of the obligations on national administrations arising from International Conventions / EU legislation. The set of policy responsibilities currently encompassed within the IMA has wider policy reach and for that reason, it was agreed that the IMA should be re-named as the Irish Maritime Directorate (IMD) and that the IMA concept as understood by international organisations would be a subset of the IMD, responsible for ensuring Ireland meets relevant international obligations. The strategy below reflects the wider range of maritime responsibilities that fall within the remit of the Department of Transport. An organogram setting out the various Divisions that make up the IMD is outlined below¹.

This review has come at a time when Ireland’s reliance on the maritime sector has been brought into sharp relief due to the Covid-19 pandemic and has resulted in us engaging with our stakeholders in new ways and allowed us to create and build relationships both internally and externally which otherwise may not have happened.

Since the pandemic started a new Government has been formed and each Department is required to produce a new Statement of Strategy reflecting the commitments set out in the new Programme for Government (a separate wider consultation on this Statement of Strategy has already been completed). A number of important commitments in that Programme which impact on the maritime sector are set out below, some of which fall fully or partially within the remit of this Department:

- Work with ports and airports to safeguard supply chains for businesses and access for tourists, as the economy is opened on a phased basis.
- Review potential to expand passenger and cargo capability at all of our ports, prioritising rail connections and interchange.
- Work with the ports and ferry companies to increase the number of foot and cycle passengers.

¹ Please note this organogram does not reflect the reporting structures of the IMD and is purely for illustrative purposes.

- Produce a longer-term plan setting out how, as a country, we will take advantage of the massive potential of offshore energy on the Atlantic Coast. This plan will focus on utilising our existing energy and maritime infrastructure.
- Examine the establishment of an offshore maritime area as Ireland's seventh national park.
- Bring forward Ireland's first ever National Marine Planning Framework. This will introduce a planning system for the development of Ireland's maritime area.
- Aggressively tackle the issue of waste, ghost nets and illegal dumping in the marine environment, through rigorous implementation of the Port Reception Facilities Directives and by requiring all Irish fishing trawlers to participate in the Clean Oceans Initiative, ensuring that plastic fished up at sea is brought ashore.
- Fund the Tourism Ireland Regional Cooperative Marketing Fund, which seeks to encourage new access and maximise the potential of existing air and sea services to those areas outside Dublin.
- Examine the development of national tourism trails linking our ferry ports and rail network.

All of these proposals, which impact across a number of Government Departments, recognise the huge value of our maritime sector in supporting economic development, international connectivity and tourism via our ports. The final maritime strategy will align with the objectives of the Department of Transport's wider Statement of Strategy and will seek to deliver on the commitments set out in the Programme for Government. It will also tie in with the Department's draft mission statement set out in the draft statement of strategy which is to support communities and facilitate prosperity by delivering - with our agencies and partners - an accessible, efficient, safe and sustainable transport system.

All of these issues have been considered in developing a strategy for the maritime sector. It was agreed that any future strategy should:

- have a clear purpose
- include a long term vision with steps to how we get there
- consider our communication with our stakeholders
- be outward facing and accessible to the public
- address the legislation challenges
- ensure appropriate resource allocation to meet our goals
- include a process to measure and assess progress and allow for a continuous review of structure and resourcing.

In order to explore these issues in more detail, discussions were held under five separate themes:

- An IMO compliant IMA
- SWOT analysis of current IMA (Strengths, Weaknesses, Opportunities and Threats)
- How to get from here to there
- Stakeholder/communications issues
- Immediate priorities and next steps.

In considering these themes, thought was given to what the current IMA did well, what could be improved upon and what we needed to do to develop this work further. The key strands emerging from those considerations were:

- Statement of IMA Strategy/Mission - objectives, goals and terms of reference
- Development of an IMA Business Plan
- Stakeholder Engagement – current structures and how to improve them
- Governance – current arrangements and any need for change
- Review of Strategies of other Maritime Administrations.

2. Draft Strategy

Following the analysis set out above, it was agreed to develop a draft strategy for the Irish Maritime Directorate based on six core objectives which essentially capture the wide range of activities undertaken by the IMA currently in a more coherent manner and serve to clarify the policy imperative that underpins them. These objectives are:

- 1. Enhance Maritime Safety through effective regulation, implementation and compliance**
- 2. Facilitate Maritime Trade and Connectivity**
- 3. Deliver an effective Maritime Emergency Response (SAR and maritime casualty & pollution response)**
- 4. Protect the Environment from Ship Source Pollution**
- 5. Strive for Organisational Excellence**
- 6. Focus on Customer Service and Stakeholder Engagement**

Each Core Objective has been further examined to determine what the IMD needs to do in order to deliver each Core Objective in addition to what we currently do. In other words, we are setting out below a series of recommendations under each objective which we believe will serve to enhance delivery of the objectives set out.

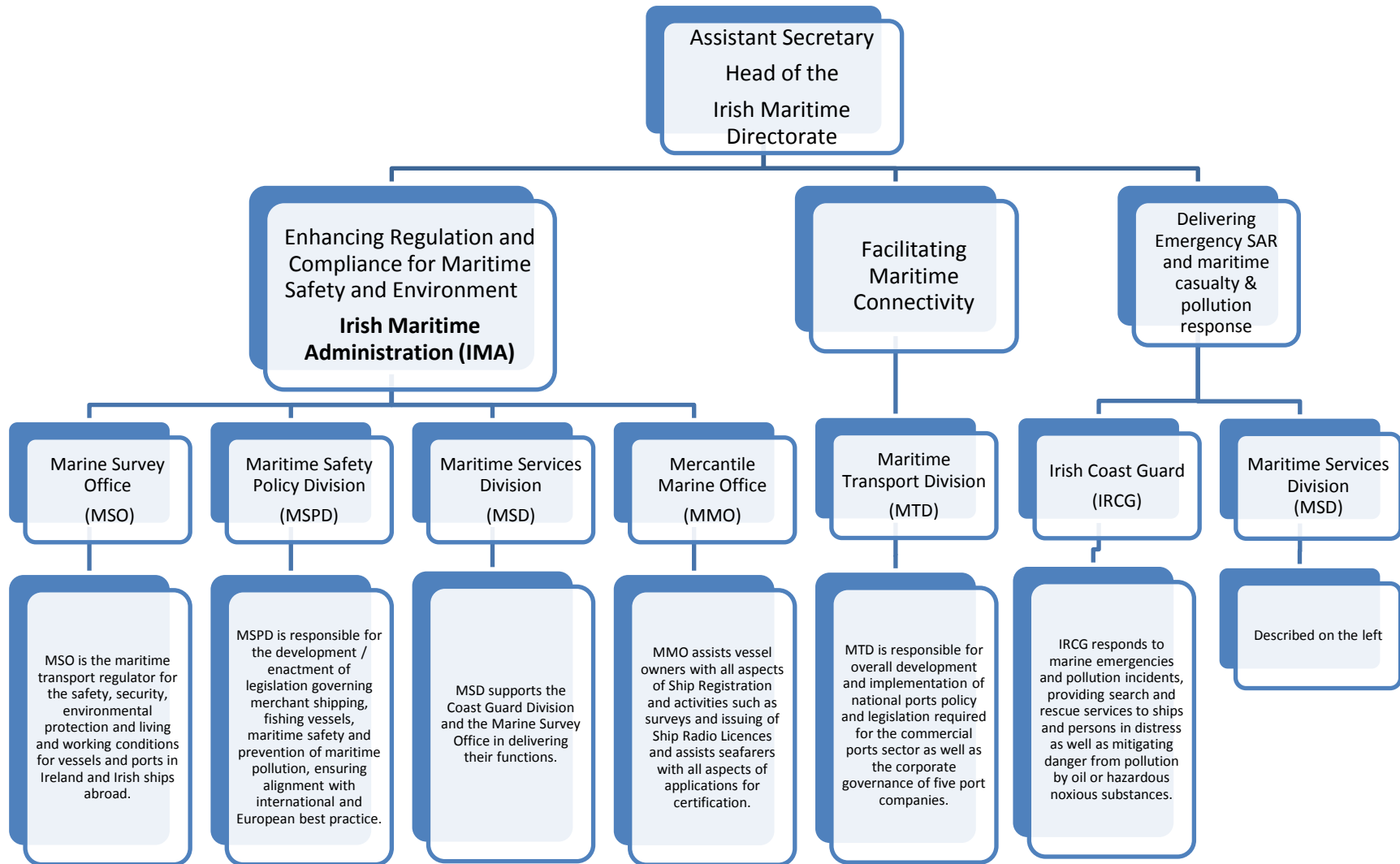
The final strategy will fall out of the Department of Transport's Statement of Strategy and as such will be consistent with and seek to deliver relevant Programme for Government commitments. We will seek to embed a continuous improvement ethos across the IMD's activities which will include regular reviews of procedures and practices; stakeholder engagement and communication strategies; all ultimately aimed at measuring and enhancing performance against the objectives set.

3. Consultation

You are invited to review the proposed recommendations set out under each Core Objective below and provide any comments you may have in relation to them.

Responses should be sent by email to maritimestrategy@transport.gov.ie before 5pm on Friday 11 December 2020. It is intended that all responses will be considered in the development of a final published maritime strategy document.

Irish Maritime Directorate



Core Objective 1: Enhance Maritime Safety through effective regulation, implementation and compliance

Overview:

Ireland is a maritime nation whose competitive trading position globally is heavily reliant on a properly functioning maritime sector, one which is safe and secure. In that context, enhancing maritime safety through the implementation of international regulatory requirements is key. For that reason, the International Maritime Organization's III Code which describes the various requirements that foster a safe and secure maritime sector is paramount. The III Code provides the template against which the IMA's performance can be benchmarked internationally. A key component in Ireland's compliance with the III Code is the degree to which we have implemented IMO Conventions and associated legislation and regulation. A more proactive approach to communication and engagement in relation to the legislative process would help ensure sectoral interests are informed in a timely manner and can prepare themselves accordingly.

Recommendations for inclusion in Maritime Strategy:

1. Develop a roadmap which includes priority legislative requirements at international, domestic and EU level. The roadmap should be risk based on priorities having regard to deadlines for implementation of EU legislation, the configuration of the Irish fleet and an analysis of ships calling at Irish Ports.
2. Establish a methodology to ensure effective implementation and enforcement of relevant international mandatory instruments.
3. Ensure reporting requirements are met with regard to the implementation of international conventions.
4. Promote greater communication with all relevant stakeholders on legislative and regulatory developments impacting on the sector.
5. Provide for enhanced engagement with international organisations such as IMO, ILO, EU Commission and EMSA to ensure Ireland's interests are represented and ensure early input into the development of legislation impacting the maritime sector.

Core Objective 2: Facilitate Maritime Trade and Connectivity

Overview:

Our economy relies heavily on maritime transport, with around 90% of all our traded goods and 10% of passengers being transported by sea. Recent estimates by the Socio-Economic Marine Research Unit (SEMURU) at NUI Galway put the overall turnover of Ireland's maritime transport sector in 2019 at €2.2 billion. Brexit and the COVID-19 crisis highlighted again the critical role maritime transport overall plays in almost every sector of society in Ireland. Given this,

consideration was given under this heading to the steps necessary to further develop and optimise the contribution the ports and shipping sectors make to the Irish economy. Also considered under this heading were the impact of Brexit on the maritime sector and a review of the resources required for the facilitation of renewable offshore installation/industries initiatives and developments. Finally, there was an examination of how the relationship between the Department, IMDO and CIL could be further strengthened in order to facilitate the valuable contribution these agencies make to the maritime transport sector.

Recommendations for inclusion in Maritime Strategy:

1. Ensure the appropriate policy framework is in place so that ports are enabled to provide, in a timely manner, the necessary capacity to meet the needs of the economy.
2. Enhance Ireland's maritime connectivity by exploring the development of a policy framework that supports the creation of new routes and services.
3. Promote the adoption across the maritime transport sector and agencies of emerging technologies to improve performance, economic competitiveness and sustainability.
4. Explore the options available to DOT that would further promote and facilitate the development of Offshore Renewable Energy projects.

Taken together, the implementation of these recommendations will help increase the resilience of the maritime transport sector. They will place the industry in a stronger position to withstand any future shocks such as those experienced with Brexit and Covid-19.

Core Objective 3: Deliver an effective Emergency Response (SAR and maritime casualty & pollution response)

Overview:

A review of the National Search and Rescue Plan (NSP) and the National Maritime Oil/HNS Spill Contingency Plan (NCP) was undertaken in order to identify their high level deliverables and reflect the measurement of those outputs in the overall strategy. Also examined was compliance across the regulatory conventions with a view to developing high level targets as well as a review of stakeholder engagement and how effective it is.

Recommendations for inclusion in Maritime Strategy:

1. Ensure an efficient and effective SAR coordination and response service in the Irish Search and Rescue Region, along the coasts and cliffs of Ireland, on inland waterways for which responsibility is assigned to IRCG, and in support of An Garda Síochána on major inland lakes and remote areas.
2. Provide strategic coordination, guidance and leadership for Ireland's National SAR system as part of the National SAR Committee (NSARC), report to the Minister for Transport on an annual basis and address specific issues that may arise.
3. Provide for effective stakeholder engagement including development and delivery of MOUs between the three SAR Coordinators and between SAR Coordinators and SAR Providers.

4. Ensure Ireland has an efficient and effective ship casualty/pollution preparedness and response coordination service within an integrated system incorporating stakeholders and other relevant Government organisations, achieved via the Implementation of the National Maritime Oil Spill and HNS Contingency Plan (NMOSCP) via the 2020 road map and supported by the establishment of the two key stakeholder fora.
5. Similar to the National SAR Plan, develop a number of national key performance indicators inclusive of a response capability matrix associated with the NMOSCP and its successful implementation, resulting in fit-for-purpose maritime incident response system providing effective response and recovery for national maritime incidents, minimising social and economic harm.
6. Develop and maintain enhanced relationships across government (national, regional, local), with the wider community and with industry to ensure efficient coordination in major incident readiness and response.
7. Continue to maintain and support the stakeholder engagement arrangements anticipated and required by the National SAR Plan.
8. Ensure the effective and efficient implementation of the NMOSCP 2020 by establishing the stakeholder engagement arrangements prescribed within that Plan.

Core Objective 4: Protect the Environment from Ship Source Pollution.

Overview:

This involved an examination of key environmental proposals at international, national and EU level which will impact on the maritime sector and how our strategy should reflect current and future climate change requirements. These proposals relate to ship source marine pollution only, which is the responsibility of the Department of Transport. The International Convention for the Prevention of Pollution from Ships (MARPOL) is the main international convention covering the prevention of pollution of the marine environment by ships from operational or accidental causes. However, the broader issue of the protection of the marine environment is one which impacts the work of other Government Departments. Ongoing engagement with these Departments on areas of common interest should continue.

Recommendations for inclusion in Maritime Strategy:

1. Explore policy options on the use of infrastructure in ports associated with onshore power supplies and alternative fuels.
2. Explore policy options on the introduction of an Irish Emission Control Area.
3. Consider environmental objectives as part of the development of any policy on acceptance criteria for joining the Irish flag.

Core Objective 5: Strive for Organisational Excellence.

Overview:

The three areas of focus under this objective were IT, Continuous Improvement and Learning and Development – all drivers of organisational excellence. Consideration was given to our current oversight arrangements, whether internal or external audit arrangements or other mechanisms to encourage continuous improvement. We also considered international best practice in areas such as Quality Management.

Recommendations for inclusion in Maritime Strategy:

1. Re-inforce the role of IT as a driver of organisational excellence, by ensuring IT innovation is embedded, encouraged and resourced at business planning level within the IMD, with strong project management structures in place.
2. Build a performance review mechanism across all the objectives for the IMD which gathers data in relation to KPIs and provides for a consistent approach to identifying lessons learnt and implementing corrective action plans across the organisation through continuous learning and development and ensure that adequately trained and skilled personnel are in place to deliver on the objectives of the IMD.
3. Ensure that adequately trained and experienced personnel are in place to deliver on the IMD's objectives based on a systematic approach to continuous professional development.

Core Objective 6: Focus on Customer Service and Stakeholder Engagement.

Overview:

Increasingly stakeholder engagement is considered an essential facet of open government. Providing stakeholders with the opportunity to contribute to the development, implementation and review of government policy and key legislative developments is not only a more inclusive means of operating but it also facilitates greater transparency, accountability and trust amongst government and stakeholders.

With this in mind a review of how the IMD currently engages with customers and stakeholders was conducted with a view to using these findings to develop a series of recommendations aimed at improving stakeholder engagement and communication. In order to determine the effectiveness of the IMDs current communication methods, examples of good practice in relation to stakeholder engagement were reviewed and their application within the IMD was considered. A survey, combining a mix of closed and open-ended questions, was then devised and distributed to elicit the views of key maritime stakeholders.

Recommendations for inclusion in Maritime Strategy:

1. Develop a communication strategy for the maritime sector to establish more formal structures to engage with relevant stakeholders regularly and systematically.

2. Ensure a more proactive and systematic approach to communicating with stakeholders particularly in relation to legislation / regulation developments.
3. Develop a “who does what” for the maritime sector providing clarity to stakeholders and allowing for better engagement.
4. Develop or utilise existing IT tools in order to better communicate with stakeholders. This may include the use of webinars and e-Newsletters and could result in the more effective targeting of Marine Notices.